

EXHIBIT D

Transcript of David J. Ross

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS

3
4 DON BRIEGER, ROBERT BECKER,)
5 ALAN BURSTIN, HARRY SCHULTZ and)
6 PAULA MITCHELL, individually and)
7 on behalf of all others similarly)
8 situated,)
9 Plaintiffs,)
10 vs.) No. 1:06-cv-1882
11 TELLABS, INC., et al.,)
12 Defendants.)

13
14 The videotaped discovery deposition
15 of DAVID J. ROSS, taken in the above-entitled
16 cause, before DERALYN GORDON, a notary public of
17 Cook County, Illinois, on the 29th day of January,
18 2009, at 77 West Wacker Drive, Fifth Floor,
19 Chicago, Illinois, beginning at approximately
20 9:48 a.m., pursuant to Notice.

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24 REPORTED BY: DERALYN GORDON, CSR, RPR, CRR
25 LICENSE NO: 084-003957

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|---|------------|
| 1 occurred. And, more generally, the declaration | 11:43:42AM |
| 2 demonstrates that there are certain participants | 11:43:47AM |
| 3 who could not recover by asserting a claim of | 11:43:50AM |
| 4 a breach of duty to disclose on any date during | 11:43:52AM |
| 5 the proposed class period, and, therefore, have | 11:43:59AM |
| 6 interclaim conflicts for the reason described in | 11:44:02AM |
| 7 the declaration. | 11:44:05AM |
| 8 Q. You make no conclusions or have an opinion | 11:44:13AM |
| 9 in this case that one way or the other that the | 11:44:16AM |
| 10 Tellabs stock was imprudent, do you? | 11:44:18AM |
| 11 A. Correct. The declaration does not reach | 11:44:21AM |
| 12 any conclusions one way or another regarding | 11:44:24AM |
| 13 either whether Tellabs stock was an imprudent | 11:44:29AM |
| 14 investment at any time during the proposed class | 11:44:34AM |
| 15 period or whether the stock price was artificially | 11:44:37AM |
| 16 inflated during the proposed class period or | 11:44:40AM |
| 17 whether there was a breach of any duty during the | 11:44:42AM |
| 18 proposed class period. | 11:44:44AM |
| 19 Q. Okay. And related to that you also | 11:44:45AM |
| 20 make no opinion or reach any conclusions, do you, | 11:44:50AM |
| 21 that -- or whether there was any damages incurred | 11:44:54AM |
| 22 by the proposed class in this case, do you? | 11:44:58AM |
| 23 MR. ALAMUDDIN: Object to the form. | 11:45:06AM |
| 24 A. Yes, in part for the same reason, that | 11:45:07AM |
| 25 you can't conclude that there are any damages | 11:45:12AM |